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14 IN THE UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA

16
17 UNITED STATES OF AMERICA, Plaintiff,
18 v.
19 DANIEL CHARTRAW, Defendant.

20 CASE NO. 2:24-CR-311 DC
21 STIPULATION TO SET TRIAL AND
22 EXCLUDE TIME UNDER SPEEDY TRIAL
23 ACT; [PROPOSED] FINDINGS AND ORDER
24 DATE: November 14, 2025
25 TIME: 9:30 a.m.
26 COURT: Hon. DENA COGGINS

27
28 STIPULATION

1. By previous order, this matter was set for status on November 14, 2025.

2. By this stipulation, defendant and the United States jointly now move to set trial in the
3 case for April 27, 2026, and to exclude time between November 14, 2025, and April 27, 2026, under
4 Local Code T4.

5. The parties stipulate and request that the schedule be set as follows:

6 Trial Commences:	April 27, 2026
7 Trial Confirmation Hearing:	March 13, 2026
8 Hearing on R. 12 Motions	February 13, 2026
9 Reply	Jan 30, 2026
10 Opposition to R. 12 Motions	January 23, 2026
11 Rule 12 Motions Filed	January 9, 2026

1 4. The parties agree and stipulate, and request that the Court find the following:

2 a) The government has produced over 4,500 pages of discovery associated with this
3 case, which includes financial documentation, investigative reports, location tracing information,
4 records of cryptocurrency transactions, and witness reports, in addition to voluminous
5 productions of digital data obtained from remote computing services. All of this discovery has
6 been either produced directly to counsel and/or made available for inspection and copying.

7 b) In addition to the produced discovery, the government is also working on a
8 forensic extraction of a relevant cell phone. Since the last update, the government has completed
9 the filter protocol. The government has offered to produce the full cell phone extraction, as well
10 as extensive email returns, to defense counsel on a hard drive provided by defense counsel.

11 c) Counsel for the defendant has represented that the produced discovery consists of
12 at least 6 large binders, in addition to the electronic evidence, and that he has not yet had an
13 opportunity to complete his review of the produced discovery. Counsel for the defendant has
14 represented that he is currently in trial, which has impacted his ability to review discovery.
15 Counsel for the defendant has also represented that he is conducting his own investigation.

16 d) Since the last status update, the time extended for consideration of the
17 government's plea offer expired.

18 e) Counsel for defendant desires additional time to review the discovery, conduct
19 additional investigation, consider appropriate motions for filing and potential defenses, and to
20 otherwise prepare for trial.

21 f) Counsel for defendant believes that failure to grant the above-requested
22 continuance would deny counsel the reasonable time necessary for effective preparation, taking
23 into account the exercise of due diligence.

24 g) Based on the above-stated findings, the ends of justice served by continuing the
25 case as requested outweigh the interest of the public and the defendant in a trial within the
26 original date prescribed by the Speedy Trial Act.

27 h) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
28 et seq., within which trial must commence, the time period of November 14, 2025 to April 27,

1 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
2 T4] because it results from a continuance granted by the Court at defendant's request on the basis
3 of the Court's finding that the ends of justice served by taking such action outweigh the best
4 interest of the public and the defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
6 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
7 must commence.

8 IT IS SO STIPULATED.

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10 Dated: November 5, 2025

Eric Grant
United States Attorney

11
12 /s/ JESSICA DELANEY
13 JESSICA DELANEY
14 Assistant United States Attorney

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16 Dated: November 5, 2025

17 /s/ ANDREW FLIER
18 ANDREW FLIER
19 Counsel for Defendant
20 Daniel Chartraw

21 [PROPOSED] FINDINGS AND ORDER

22 IT IS SO FOUND AND ORDERED this ____ day of _____, _____.
23

24 _____
25 THE HONORABLE DENA COGGINS
26 UNITED STATES DISTRICT JUDGE
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